

# **EXHIBIT 24**

## **REDACTED**

IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF TEXAS  
SHERMAN DIVISION

Case No.: 4:20-CV-00957-SDJ

- - - - -X

STATE OF TEXAS, et al., :

Plaintiffs :

:

VS :

:

GOOGLE, LLC, :

Defendant :

- - - - -X

HIGHLY CONFIDENTIAL  
PURSUANT TO PROTECTIVE ORDER  
May 10, 2024

Videotaped deposition of [REDACTED] taken at  
the offices of Freshfields Bruckhaus Deringer LLP,  
Three World Trade Center, New York, New York, before  
Clifford J. Edwards, Certified Shorthand Reporter and  
Notary Public, in and for the State of New York on May  
10, 2024, at 9:35 a.m. EST.

Job No. MDLG6691686

1 BY MS. YOUNG:

2 Q And with respect to -- I know it's always  
3 a little hard to quantify chats, but with respect  
4 to, kind of, individual Chat messages, about how  
5 many would you send a day?

6 A And -- and by, like, individual Chats,  
7 like, you mean, like, every time you hit enter? Or,  
8 like, what's a -- a unit of "Chat"?

9 Q Yes. For every time you hit enter,  
10 approximately how many chats do you send a day?

11 A Hundreds maybe. Like, hundreds of lines.  
12 I'm not sure.

13 Q Do you send more chats than e-mails a  
14 day?

15 A I'm not sure.

16 Prob- -- if we are talking about unit of  
17 chat being like a single response, like "okay" could  
18 be, like, a chat, then probably. Just because the  
19 content of an e-mail is a little more organized or  
20 robust than that.

21 But I don't -- I've never really  
22 compared, so I don't know.

23 Q Is there a difference between the content  
24 type in the e-mails you'll send versus the chats  
25 you'll send?

1           A       There may be. There may be differences,  
2       yes.

3           Q       And you don't know without looking at  
4       your chats and your e-mails; correct?

5                   MS. VACA: Object to the form.

6           A       I guess, like, without kind of a specific  
7       example in mind, I just -- I don't -- you know,  
8       there -- the -- chat is used differently certainly  
9       than -- than e-mail.

10                   You know, we -- I wouldn't be asking  
11       people where -- where they are going for lunch on  
12       e-mail, usually. I would say that's just more work  
13       than it's worth.

14                   So there -- there will be differences  
15       but...

16       BY MS. YOUNG:

17           Q       With respect to business subjects, are  
18       there things that you'll chat about that don't  
19       appear in e-mail?

20           A       I don't -- nothing comes to mind.

21                   I -- e-mail is a -- is a very common and  
22       heavily used form of communicating things back and  
23       forth at Google, so it's used for moat things.

24           Q       But it sounds like on some days you may  
25       send more individual chat lines than e-mail; is that

1 correct?

2 MS. VACA: Object to the form.

3 A I'm not sure. It -- it's possible  
4 just -- just given how we discuss, like, a unit of  
5 chat might just be, like, a word so...

6 BY MS. YOUNG:

7 Q Are you part of any Chat groups?

8 A I'm in groups, yeah. So multiperson chat  
9 threads or discussions, yes.

10 Q And those are ongoing; right?

11 MS. VACA: Object to the form.

12 A It -- what do you mean by "ongoing"?

13 BY MS. YOUNG:

14 Q They are like running chats, they last  
15 for more than a day or they last for a longer period  
16 of time?

17 A Huh.

18 MS. VACA: Object to the form.

19 A I see.

20 Sometimes they are. Sometimes they, you  
21 know, are -- are team groups, for example, other  
22 times they -- maybe they were created just for a  
23 specific, you know, meeting or event that was had  
24 and then nobody engages in them again. So some --  
25 some end and are temporary and then some are more as

C E R T I F I C A T E

I hereby certify that I am a Notary Public,  
in and for the State of New York, duly commissioned  
and qualified to administer oaths.

I further certify that the deponent named in  
the foregoing deposition was by me duly sworn, and  
thereupon testified as appears in the foregoing  
deposition; that said deposition was taken by me  
stenographically in the presence of counsel and  
reduced to typewriting under my direction, and the  
foregoing is a true and accurate transcript of the  
testimony.

I further certify that I am neither of  
counsel nor attorney to any of the parties to said  
suit, nor am I an employee of any party to said  
suit, nor of any counsel in said suit, nor am I  
interested in the outcome of said cause.

Witness my hand and seal as Notary Public  
this 13th day of May, 2024.



Clifford Edwards

New York Notary ID Number: 01ED6430906

Notary commission expires: 3/28/2026

**ERRATA SHEET FOR THE TRANSCRIPT OF** [REDACTED]

Case Name: The State of Texas, et al. v. Google, LLC, No. 4:20-CV-957-SDJ

Dep. Date: May 10, 2024

Deponent: [REDACTED]

Page	Line	Corrections	Reason for Correction
28	24	The phrase “User-experienced” should read “user-experience”	Transcription Error
32	17	The phrase “what’s called an associate” should read “what’s called a associate”	Transcription Error
35	12	The phrase “Ads, Privacy, and Safety” should read “Ads Privacy and Safety”	Transcription Error
39	9	The phrase “but they’ve have been” should read “but they’ve been”	Transcription Error
44	2	The phrase “can you maybe” should read “could you maybe”	Transcription Error
44	14-15	The phrase “referencing that’s the way that” should read “referencing that that’s the way that”	Transcription Error
44	19	The phrase “how the tool–the tool” should read “how the–the tool”	Transcription Error
57	24	The phrase “that’s the kind” should read “that’s the kinds”	Typographical error
63	4	The phrase “Didn’t that also” should read “Did that also”	Transcription error
71	5	The phrase “of previously two separate” should read “of two previously separate”	Transcription error
76	11	The phrase “[REDACTED]” should read “[REDACTED]”	Typographical error
83	6	The phrase “to essentially the” should read “to essentially this”	Typographical error
89	7	The phrase “two to 5 percent” should read “2 to 5 percent”	Typographical error
92	11-12	The phrase “you referenced to Project” should read “in reference to Project”	Transcription error
92	25	The phrase “there are” should read “they are”	Typographical error
119	15	The phrase “in the middle that” should read “in the middle the”	Typographical error
142	20	The phrase “provider third party” should reader “provider of third party”	Typographical error
144	4	The phrase “of a third party” should read “of third party”	Transcription error
161	15	The phrase “reflector” should read “reflecting”	Transcription error
188	6	The phrase “senior position” should read “senior in position”	Transcription error

Page	Line	Corrections	Reason for Correction
217	19	The phrase “messaging since” should read “messaging since”	Typographical error
221	23	The phrase “moat things” should read “most things”	Typographical error
224	22	The phrase “litigation holds” should read “litigation hold”	Typographical error
224	25	The phrase “purpose or the case” should read “purpose or case”	Transcription error
228	23	The phrase “that ability. Currently I don’t” should read “that ability currently. I don’t”	Typographical error
229	18	The phrase “personality things” should read “personal things”	Transcription error
233	5	The phrase “possible it happened” should read “possible it’s happened”	Typographical error
246	8-9	The phrase “what kind level” should read “what level”	Transcription error
247	18	The phrase “the kind of metrics” should read “the kinds of metrics”	Typographical error
247	18	The phrase “but the kind” should read “but the kinds”	Typographical error
250	15	The phrase “process takes” should read “process that takes”	Transcription error
250	22	The phrase “in how” should read “in determining how”	Transcription error
250	23	The phrase “and productively” should read “and effectively”	Transcription error
250	24	The phrase “And so part” should read “And part”	Transcription error
255	7	The phrase “What did” should read “What is”	Transcription error
258	21-22	The phrase “do have some” should read “do kind of have some”	Transcription error
258	22	The phrase “this position” should read “this description”	Transcription error
267	3	The phrase “if it was added” should read “if it was attended”	Transcription error
268	23	The phrase “don’t really understand” should read “don’t totally understand”	Transcription error
269	5	The phrase “it seems I’m” should read “it seems like I’m”	Transcription error
271	20	The phrase “composition or” should read “competition or”	Transcription error
278	8	The phrase “a lot of the” should read “a lot on the”	Typographical error
292	9	The phrase “that’s not that” should read “that’s not one that”	Transcription error
292	15	The phrase “context and more” should read “context to more”	Transcription error
292	21	The phrase “Objection to the” should read “Object to the”	Typographical error
293	22	The phrase “this slide” should read “the slide”	Typographical error
306	15	The phrase “advertiser or customers” should read “advertiser customers”	Typographical error
310	18	The phrase “Objection to the” should read “Object to the”	Typographical error



Page	Line	Corrections	Reason for Correction
311	24	The phrase “being the reason” should read “being the the reason”	Transcription error
315	8	The phrase “difference or lack” should read “density or lack”	Transcription error
318	5	The phrase “as DSP” should read “as a DSP”	Typographical error
326	14	The phrase “defensible a sale” should read “defensible the sale”	Transcription error
333	7	The phrase “the word I” should read “the word that I”	Transcription error
333	7	The phrase “described is transparency” should read “described was transparency”	Transcription error

I have inspected and read my deposition and have listed all changes and corrections above, along with my reasons therefore.

Date: \_\_\_\_\_ June 10, 2024 \_\_\_\_\_

Signature: \_\_\_\_\_

